familiarity or awareness of an employee or employees or agent or agents of Dana.

11. Dana objects to each interrogatory and part thereof calling for opinions rather than facts.

12. Dana objects to each interrogatory unless plaintiffs identify a product injuring plaintiffs for which Dana is responsible.

13. Dana is a multi-national corporation with thousands of employees at plants and facilities across the nation and around the world. Dana cannot possibly be expected to answer about all the information in the possession of those thousands of employees past and present. Dana therefore objects to the definition of "you", "your", and "your Company" or "the Company". Dana answers these interrogatories on behalf of itself with information developed after a reasonable investigation into the relevant facts. For the reasons stated in the Preliminary Statement, Dana strictly limits these answers to Victor.

14. Defendant objects to each interrogatory or part thereof to the extent that the interrogatory relates to a Dana product if the interrogatory fails to identify the precise product that plaintiff was, in fact, exposed to. Any such general interrogatory is overbroad and burdensome to answer and would be subject to other General Objections, e.g., General Objection 2.

The objections stated above are incorporated by reference in each response herein, as if fully set forth below. No such objection is waived by answering an interrogatory in whole or in part.